

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :  
JOSEPH AND PATRICIA DODGSON : CHAPTER 13  
Debtors. :

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SPECIALIZED LOAN SERVICING :  
: :  
Movant, :  
: :  
vs. :  
JOSEPH AND PATRICIA DODGSON : CASE NO. 5-13-00178  
Respondents. :

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**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM  
AUTOMATIC STAY UNDER SECTION 362**

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AND NOW COMES, Joseph and Patricia Dodgson, the Debtor, and files an Answer to  
Specialized Loan Servicing Motion for Relief From the Automatic Stay:

1. Joseph and Patricia Dodgson(hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor has failed to make post-petition mortgage payments.
3. Debtor Counsel is in the possession of funds needed to cure the default.
4. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: July 13, 2017

/s/Tullio DeLuca  
Tullio DeLuca, Esquire  
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**CERTIFICATE OF SERVICE**

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The undersigned hereby certifies that on July 13, 2017, he caused a true and correct copy of Debtor's Answer to Specialized Loan Servicing's Motion for Relief from the Automatic Stay to be served Via First Class United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Charles J. DeHart, III, Esq. at [dehartstaff@ramapo.com](mailto:dehartstaff@ramapo.com)

James Warmbrodt, Esq.

Dated: July 13, 2017

/s/Tullio DeLuca  
Tullio DeLuca, Esquire